

October 3, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

Re: *Ex Parte Presentation*
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200,
95-116, 98-170 and NSD File No. L-00-72

Dear Ms. Dortch:

On October 2, 2002, the Cellular Telecommunications & Internet Association ("CTIA") represented by Michael Altschul, Senior Vice President for Policy and Administration and Diane Cornell, Vice President for Regulatory Policy, met with Jim Schlichting, Deputy Chief, David Furth, Senior Legal Advisor to the Bureau Chief, Jeffrey Steinberg, Deputy Chief of the Commercial Wireless Division, Wayne Leighton, Economist in the Wireless Telecommunications Bureau and Diane Law Hsu, Acting Deputy Division Chief, Telecommunications Access Policy Division of the Wireline Competition Bureau.

At the meeting, CTIA reiterated its position that the existing revenue-based Universal Service Fund ("USF") assessment system should be retained as the most fair and equitable manner of collecting USF funds. The meeting began with the presentation of an interstate traffic study containing information from six wireless service providers. As detailed in the attached study, the percentage of interstate traffic carried by the six wireless service providers ranged from 10 percent to 28.5 percent.

Based on these studies, CTIA acknowledged that it would be appropriate to re-examine the wireless safe-harbor proxy. Under such a scenario, carriers could report traffic data on a quarterly basis to allow for adjustments in the traffic reported as necessary. CTIA also noted that this system, unlike a connection-based fee, would comport with Section 254(d) of the 1996 Act. Furthermore, preservation of the revenue-based USF collection system would also prevent disproportionate harm to no-use, low-use and low-income wireless service users.



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The attached presentation was discussed at the meeting. Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed with your office. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Altschul". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Altschul".

Michael Altschul

Attachment

cc: James Schlichting
David Furth
Jeffrey Steinberg
Diane Law Hsu
Walter Leighton